

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

NVIDIA CORPORATION, *et al.*,

Defendant.

Civil Action No. 2:15-cv-998-JRG-JRP

CONSOLIDATED LEAD CASE

JURY TRIAL DEMANDED

**JOINT MOTION TO STAY ALL PENDING DEADLINES AND
NOTICE OF SETTLEMENT**

Plaintiff Display Technologies, LLC (“Plaintiff”), and Defendant JK Imaging Ltd. (“Defendant”) (collectively, “the parties”) have reached a settlement agreement in principle that resolves all matters in controversy between Plaintiff and Defendant in the above-entitled and numbered action. The parties expect to jointly file a dismissal with prejudice of all claims between them within 30 days. Accordingly, Plaintiff and Defendant respectfully request the Court stay all deadlines between them for 30 days, up to and including March 7, 2016. Plaintiff and Defendant request this Stay, not for the purposes of any delay, but so that they may finalize the settlement agreement and file dismissal papers without incurring additional expenses.

DATED February 5, 2016.

Respectfully submitted,

By: /s/ Krystal L. McCool
Hao Ni
Texas Bar No. 24047205
hni@nilawfirm.com
Timothy T. Wang
Texas Bar No. 24067927
twang@nilawfirm.com
Neal G. Massand
Texas Bar No. 24039038
nmassand@nilawfirm.com
Stevenson Moore V
Texas Bar No. 24076573
smoore@nilawfirm.com
Krystal L. (Gibbens) McCool
Texas Bar No. 24082185
kgibbens@nilawfirm.com

NI, WANG & MASSAND, PLLC
8140 Walnut Hill Ln., Ste. 500
Dallas, TX 75231
Tel: (972) 331-4600
Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF
DISPLAY TECHNOLOGIES, LLC**

/s/ Irfan Lateef
Irfan Lateef
California Bar No. 204,004
ilateef@kmob.com
KNOBBE MARTENS
2040 Main St., 14 Floor
Irvine, CA 92614
Telephone: (949) 760-0404
Facsimile: (949) 760-9502

**COUNSEL FOR DEFENDANT JK
IMAGING LTD.**

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Krystal L. McCool

Krystal L. McCool